

## IMVE notes

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**From:** s.38 (FINTRAC/CANAFE)" s.38 @fintrac-canafe.gc.ca>  
**To:** "MacKillop, Barry (FINTRAC/CANAFE)" <barry.mackillop@fintrac-canafe.gc.ca>  
**Date:** Wed, 09 Feb 2022 14:53:06 +0000  
**Attachments:** Illicit Finance and Crowdfunding.pdf (1.45 MB)

Bumping my IMVE notes below from last week back to the top of your inbox, as I mentioned we are very engaged on the issue particularly with our s.38

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Other relevant points re: IMVE and crowdfunding:

- ~ Chapter 2 of the FATF's report on Ethnically and Racially Motivated Violent Extremism addresses the role of crowdfunding. There is a good case study from AUSTRAC included. There is also an example from Canada however this was not part of FINTRAC's submission to this project so it must have come from another organization in Canada's FATF delegation, <https://www.fatf-gafi.org/media/fatf/documents/reports/Ethnically-or-racially-motivated-terrorism-financing.pdf>

- ~ From SIRA's Special Bulletin: <https://www.fintrac-canafe.gc.ca/intel/bulletins/imve-eng>
  - o ~ Internationally, IMVE threat actors have raised funds through commercial activities, such as selling merchandise, holding events such as talks and concerts, crowdfunding, charging membership fees and accepting donations. IMVE threat actors have also been known to turn to drug trafficking, weapons trafficking and robberies to fund their operations. IMVE threat actors use the funds raised to recruit new members, engage in day-to-day activities and carry out promotional efforts such as making videos. In addition, the funds go toward organizing marches and events, maintaining websites, paying the legal fees of individuals arrested for their involvement in the IMVE movement, acquiring weapons and establishing safe houses.

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In recent years, online crowdfunding platforms and social media sites have started to crack down on IMVE fundraising and promotional activities. This has led IMVE threat actors to seek alternative outlets. These tend to be smaller platforms than the mainstream ones, and they do not always have the resources to monitor and shut down IMVE activities. In response to increased restrictions on online platforms, IMVE threat actors have been encouraging their followers to send them money via mail, cheques or money orders. Following their de-platforming, IMVE threat actors have also increasingly turned to virtual currencies for fundraising. Threat actors mainly use virtual currency donations to fund their propaganda and recruitment efforts. The use of virtual currency has been associated with only one IMVE attack so far...

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Using personal accounts, IMVE threat actors largely relied on electronic money transfers and cash deposits for their fundraising activities. These transfers typically involved small amounts. The majority of funds were suspected to be used to buy firearms and gear, as well as for donations and membership fees. s.38

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Let me know if you need anything else,

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**From:** MacKillop, Barry (FINTRAC/CANAFE) <Barry.MacKillop@fintrac-canafe.gc.ca>  
**Sent:** February 4, 2022 1:33 PM  
**To:** Paquet, Sarah (FINTRAC/CANAFE) <Sarah.Paquet@fintrac-canafe.gc.ca>; Gibb, Darren (FINTRAC/CANAFE) <Darren.Gibb@fintrac-canafe.gc.ca>; s.38 (FINTRAC/CANAFE) s.38@fintrac-canafe.gc.ca>  
**Cc:** Lambert, Dan (FINTRAC/CANAFE) <Dan.Lambert@fintrac-canafe.gc.ca>; s.38 (FINTRAC/CANAFE) s.38@fintrac-canafe.gc.ca>; s.38 (FINTRAC/CANAFE) s.38@fintrac-canafe.gc.ca>  
**Subject:** FW: GoFundMe and IMVE notes

As per our discussion. Please see below information from s.38 and attached. I believe this positions us well for the meeting on Monday with the MO. We are also checking with s.38 s.55 PCMLTFA s.38

**Barry MacKillop** (he / him / il / lui)

Deputy Director, Intelligence

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*Please do not hesitate to respond in the official language of your choice. | I am located on the traditional, unceded territory of the [Anishinaabe Algonquin](#) Peoples.*

Sous-directeur, renseignement

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**From:** s.38 (FINTRAC/CANAFE) s.38@fintrac-canafe.gc.ca>

**Sent:** February 4, 2022 11:24 AM

**To:** MacKillop, Barry (FINTRAC/CANAFE) <[Barry.MacKillop@fintrac-canafe.gc.ca](mailto:Barry.MacKillop@fintrac-canafe.gc.ca)>

**Cc:** s.38 (FINTRAC/CANAFE) s.38@fintrac-canafe.gc.ca>

**Subject:** GoFundMe and IMVE notes

Hi Barry,

Based on your discussion with the Director and Darren this morning, here are some quick notes to prep for your meeting. Let me know if you need anything further. Thanks!

GoFundMe:

- Headquartered in California.
- Does not meet PCMLTFA definition of an MSB.
- Does not take a cut of donations. Revenue model is based on soliciting tips from donors, transaction processing fees, and ads.

Crowdfunding in Canada:

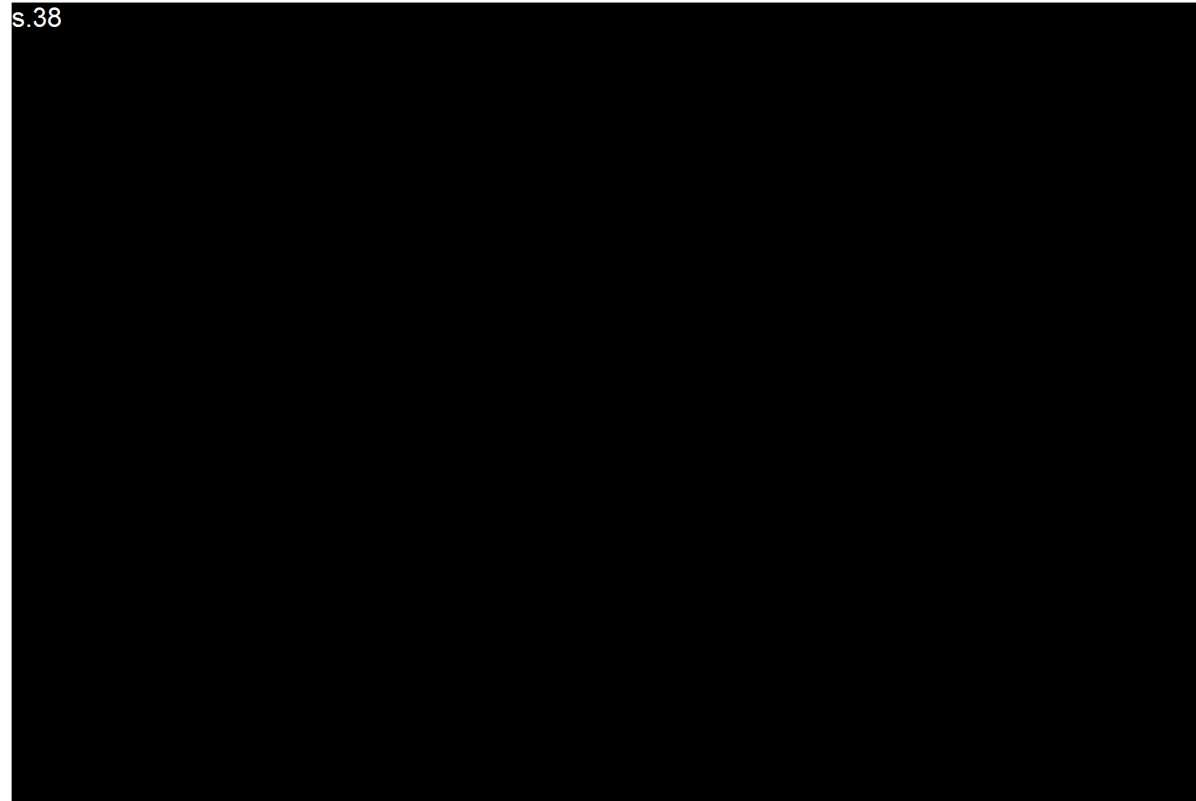
- ~ Handy website listing crowdfunding platforms available to Canadians (spoiler: not many based in Canada): <https://cmf-fmc.ca/now-next/directories/crowdfunding-platforms/>
- ~ Good CBC article regarding commonly asked questions regarding GoFundMe: <https://www.cbc.ca/news/politics/questions-answers-gofundme-convoy-1.6338932>
- ~ Interestingly, I can't find a Canada-specific contact for GoFundMe online, so I'm not sure who will respond to Parliament's request.
- ~ Attached article from Jess Davis on use of crowdfunding for TF/ML.
- ~ [Security experts concerned about possible 'threat financing' tied to trucker convoy | Globalnews.ca](#) – it would appear the security expert referenced in the headline is Jess.

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Intelligence Sector response to convoy to-date:

- ~ Active and constant monitoring of open source reporting to determine any possible terrorist financing concerns we may search against our database. This includes ongoing collaboration and communication with our strategic intelligence staff.
- ~ Manual and automated STR monitoring for IMVE TF-related keywords and indicators to identify info that may need to be passed to national security partners on an urgent basis.
- ~ Daily communication with our national security partners both among execs/managers and at the working level.
- ~ Communication between DD-Intel and major reporters to ensure they are aware of/actively monitoring the convoy for possible TF/ML concerns.
- ~ Proactive compilation of relevant existing reporting in our database for disclosure to partners (pending your approval of course).

s.38



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Team Leader | Chef d'équipe

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